

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IMANI HATCHER, et al.,

Plaintiffs,

v.

Case No. 5:18-CV-11986-JEL-EAS
Hon. Judith E. Levy

GENESEE COUNTY, et al.,

Defendants,

/

**PLAINTIFFS' COUNSEL'S REPORT REGARDING EFFORTS TO CONTACT ALL
PLAINTIFFS REGARDING COUNSEL'S MOTION TO WITHDRAW**

NOW COMES Counsel for Plaintiffs, Solomon Radnor, of EXCOLO LAW, PLLC; Conrad Benedetto, of LAW OFFICES OF CONRAD BENEDETTO; and Stephen F. Monroe, of MARC J. BERN & PARTNERS, LLP Counsel for Plaintiffs IMANI HATCHER, et. al., who respectfully submit their report regarding efforts to contact all plaintiffs regarding the Motion to Withdraw filed on May 20, 2020:

1. After the June 10, 2020, hearing regarding Plaintiffs' Counsel's Motion to Withdraw [Dkt. 32], the Court ordered Plaintiffs' counsel to use all reasonable means to contact the plaintiffs in this matter.

2. Over the course of the next approximately two weeks, Counsel Stephen Monroe undertook to account for all known addresses and phone numbers of the plaintiffs and to contact them through reasonable means. He did this by performing skip traces of all clients and monitoring the Michigan Department of Corrections' website, Offender Tracking Information System (OTIS). He also contacted opposing counsel to see who was under Defendants' custody. He also compared all original mailings with any new addresses learned from skip tracing, from the OTIS site, and from conferring with opposing counsel. He also contacted all phone numbers that he learned of

from the skip traces in an attempt to speak to any of the plaintiffs and then confirm current addresses. He did not have success reaching any clients by telephone only. Regarding one plaintiff, Maegan Dawson, he has been unable to locate or find any contact information.

3. He then sent out 174 letters advising the plaintiffs of the pending motion to withdraw, that the Court was inclined to grant it, and that they should contact him immediately to discuss the motion, the reasons behind it, and steps they could take. This number of letter reflects multiple addresses for different plaintiffs. For some plaintiffs, as many as three letters were sent. One envelope has been returned, addressed to Simon Greenlick. This was mailed to the only address available by the means described above.

4. He sent those letters out in batches, the last one of which occurred on July 2, 2020. He also sent five letters on July 15, 2020, when additional contact information was learned. In response, he spoke with six of the plaintiffs. Four, Jacrisha Johnson, Rayna Miller McKay, Joseph Murphy, and Jordan Tarrance, agreed with the reasons for withdrawal and to dismissing the case. The fifth, Jeremy Tyree, hung up his telephone in the middle of the conversation and did not respond to any further contact attempts. The sixth, Brian Brochu, filed a written opposition.

Dated: July 29, 2020

Respectfully Submitted,

MARC J. BERN & PARTNERS, LLP

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CERTIFICATE OF SERVICE

The undersigned certifies that this report was served in accordance with the Court's electronic filing guidelines. Notice of Electronic Filing of these documents will be sent to all parties via the Court's electronic filing system on July 29, 2020.

/s Stephen F. Monroe